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June 13, 2025

Judge Lewis A. Kaplan
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Amy Gallina v. Target Corp.
Case No.: 25-cv-4658 (LAK)

Dear Judge Kaplan:

Our office represents Defendant Target Corp. in the above captioned action.

We are in receipt of your Order dated June 10, 2025, requiring Target to file an amended notice of removal to address the issue of subject matter jurisdiction by June 16, 2025.

I have tried speaking with the plaintiff's attorney regarding this application, but he has not returned my call or email.

We are respectfully requesting an additional 10 days to file the amended notice of removal. The basis for this is to obtain the information requested as well as to re-visit the issue of fraudulent joinder which would render the issue regarding the individual members of the LLC party's moot. There is also a tender from one of the LLCs to Target which is being resolved simultaneously.

Accordingly, Target respectfully requests a 10-day extension of time to file the amended notice of removal

Very truly yours,

MOLOD SPITZ & DeSANTIS, P.C.

By: Alice Spitz
ALICE SPITZ, ESQ.

AS:/mdr

cc. Mark T. Freeley, Esq. – Attorney for Plaintiff – via email

SO ORDERED

LEWIS A. KAPLAN, USDI
6/16/25

